



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

FEB 24 2017

Mr. Ravi Ramalingam, Chief
Consumer Products and Air Quality Assessment Branch
Air Quality Planning and Science Division
California Air Resources Board
P.O. Box 2815
Sacramento, California 95812

Dear Mr. Ramalingam:

In the State of California, ten districts plus the California Air Resources Board (ARB) submitted annual monitoring network plans this past year in accordance with 40 CFR 58.10. The U.S. Environmental Protection Agency (EPA) received plans covering the 2015 calendar year from:

- Bay Area Air Quality Management District,
- Great Basin Unified Air Pollution Control District,
- Monterey Bay Unified Air Pollution Control District,
- North Coast Unified Air Pollution Control District,
- Sacramento Metropolitan Air Quality Management District,
- San Diego County Air Pollution Control District,
- San Joaquin Valley Air Pollution Control District,
- San Luis Obispo County Air Pollution Control District,
- Santa Barbara County Air Pollution Control District, and
- South Coast Air Quality Management District.

EPA has reviewed and approved all of the plans listed above. EPA has provided specific comments on the plans we received from California local agencies through separate letters, and have forward these to ARB. Please refer to these responses for additional comments pertinent to ARB's network. With this plan approval, we formally approve the following system modification: replacement of the non-FEM PM_{2.5} monitor at Red Bluff-Walnut (AQS ID 06-103-0007) with a SLAMS FEM. As noted in the seasonal ozone waiver approval EPA sent on March 8, 2016, an updated waiver request (including 2016 data) is required should you wish to continue seasonal monitoring after March 31, 2017.

We appreciate your efforts in preparing the *Annual Network Plan Covering Monitoring Operations in 25 California Air Districts, June 2016* ("plan"), submitted by ARB in July 2016. We have reviewed the submitted document based on the requirements set forth under 40 CFR 58. Based on the information provided in the plan, EPA approves all portions of the network plan except those specifically identified below. Please note that we cannot approve portions of the annual network plan for which the

information in the plan is insufficient to judge whether the requirement has been met, or for which the information, as described, does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has not delegated approval authority to the regional offices. Accordingly, the first enclosure (*A. Annual Monitoring Network Plan Items where EPA is Not Taking Action*) provides a listing of specific items of ARB's plan where EPA is not taking action. Some annual network plans submitted by local agencies included sites operated by ARB. Missing or deficient information for ARB sites in local agency plans was addressed in the approval letters for each local agency. For convenience, we are providing a synthesized list of these issues in *Enclosure B. Elements Related to ARB Sites in Local Agency Plans Where EPA is Not Taking Action*. The third enclosure (*C. Additional Items Requiring Attention*) is a listing of additional items in the plan that EPA wishes to bring to your agency's attention based on ARB's plan.

The fourth enclosure (*D. Annual Monitoring Network Plan Checklist*) is the checklist EPA used to review your plan for overall items that are required to be included in the annual network plan along with our assessment of whether the plan submitted by your agency addresses those requirements.

The first and third enclosures highlight a subset of the more extensive list of items reviewed in the fourth enclosure. All comments conveyed via this letter (and enclosures) should be addressed (through corrections within the plan, additional information being included, or discussion) in next year's annual monitoring network plan.

If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 947-4134.

Sincerely,



Gwen Yoshimura, Acting Manager
Air Quality Analysis Office

Enclosures:

- A. Annual Monitoring Network Plan Items where EPA is Not Taking Action
- B. Elements Related to ARB Sites in Local Agency Plans Where EPA is Not Taking Action
- C. Additional Items Requiring Attention
- D. Annual Monitoring Network Plan Checklist

cc (via email): Gayle Sweigert, ARB
 Kenneth Stroud, ARB
 Michael Miguel, ARB
 Michael Werst, ARB

A. Annual Monitoring Network Plan Items where EPA is Not Taking Action

We are not acting on the portions of annual network plans where either EPA Region 9 lacks the authority to approve specific items of the plan, or EPA has determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met.

- System modifications (e.g., site closures or moves) are subject to approval per 40 CFR 58.14(c). Information provided in the plan was insufficient for EPA to approve the system modifications listed in the plan per the applicable requirement. Therefore, we are not acting on the following item as part of this year's annual network plan (see Checklist Row 3):
 - New SLAMS PM_{2.5} monitor at Red Bluff-Walnut (AQS ID 06-103-0007)
- EPA identified items in your agency's annual monitoring network plan where a requirement was not being met or information in the plan was insufficient to judge whether the requirement was being met based on 40 CFR 58.10 and the associated appendices. Therefore, we are not acting on the following items:

Item	Checklist Row	Issue
Modification to SLAMS network	3	Insufficient information to judge in one instance
PM _{2.5} QA collocation	25	Insufficient information to judge
Sampling schedule PM _{2.5}	33	Not meeting in some instances
Semi-annual PM _{2.5} flow rates	36	Not meeting in one instance
Identification of sites comparable to the annual PM _{2.5} NAAQS	27	Incorrect in some instances
PM _{2.5} flow rate verifications	34	Incorrect in one instance
Manual PM ₁₀ collocation	38	Not meeting
Sampling schedule PM ₁₀	39	Not meeting in some instances
Semi-annual PM ₁₀ flow rates	42	Not meeting in one instance
One-point QC checks (gaseous)	51	Not meeting in one instance; insufficient information to judge
Shared monitoring responsibilities agreement	16	Insufficient information to judge
Regional PM _{2.5} background and transport site	32	Not meeting in one instance
Monitoring objective	70	Incorrect in some instances
Monitor type, network affiliation	72	Incomplete in two instances
Scale of representativeness	73	Incorrect; insufficient information to judge
Distance from supporting structures	81	Not meeting in some instances
Distance from obstructions on roof	82	Not meeting in one instance
Distance from obstructions not on roof	83	Not meeting in some instances
Distance from trees	84	Not meeting in some instances
Probe material	87	Insufficient information to judge in one instance
Residence time	88	Insufficient information to judge in one instance

Additional information for each of these items may be found for the row listed in column 2, in the fourth enclosure (*D. Annual Monitoring Network Plan Checklist*).

B. Elements Related at ARB Sites in Local Agency Plans where EPA is Not Taking Action

We are not acting on the portions of annual network plans where either EPA Region 9 lacks the authority to approve specific items of the plan, or EPA has determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met.

- Per 40 CFR 58.11(c), NCore, STN, and PAMS network design and changes are subject to approval of the EPA Administrator. Therefore, we are not acting on these items.
- EPA identified items in the following annual monitoring network plan where a requirement was not being met or information in the plan was insufficient to judge whether the requirement was being met based on 40 CFR 58.10 and the associated appendices. Therefore, we are not acting on the following items:

Item	Checklist Row	Issue
Distance from lovol PM instruments	Sacramento, 19	Insufficient information to judge in one instance
Distance from hivol PM instruments	Sacramento, 20	Insufficient information to judge in one instance
Monitor type for each monitor	Sacramento, 72	Incorrect in some instances
Scale of representativeness	San Luis Obispo, 73	Insufficient information to judge in one instance
Identification of maximum concentration O ₃ sites	San Joaquin Valley (SJV), 54	Insufficient to information to judge in some instances
Minimum monitoring requirements for RA40 NO ₂	SJV, 59	Not meeting requirement
Scale of representativeness	SJV, 73	Insufficient to judge/incorrect
Probe height	SJV, 80	Not meeting requirement
Distance from supporting structure	SJV, 81	Not meeting requirement
Distance from trees	SJV, 84	Not meeting requirement
Distance of monitor from nearest road	Santa Barbara, 77	Not meeting requirement
Traffic count of nearest road	Santa Barbara, 78	Insufficient information to judge

In addition, the following comments were made in EPA's annual network plan approval letters for the following agencies:

Sacramento Metropolitan Air Quality Management District:

- [Items 11, 57] As noted in the plan, according to the latest AADT data from Caltrans, Sacramento CBSA is required to implement a second near-road NO₂ monitor. Please continue to work with EPA to determine the appropriate timeline associated with this requirement.

San Joaquin Valley Air Pollution Control District:

- [Item 39] Based on Oildale's 2015 PM₁₀ design concentration of 121 µg/m³, sampling frequency for PM₁₀ monitoring should shift from a 1:6 to a 1:3 operating schedule starting January 1, 2017. The plan notes that the Oildale FEM PM₁₀ monitor has been suspended as of 8/28/2015

due to rooftop safety issues and will resume operation and replace the current FRM monitor once rooftop safety issues have been resolved.

- [Item 72] Speciated PM_{2.5} monitors at Fresno Garland should also list NCore as Network Affiliation with STN – multiple Network Affiliations are permitted. For all SPMs operating FRM or FEM monitors for longer than two years, please consider switching the monitor type to SLAMs, especially for any monitors violating the NAAQS, since they would require approval for shutdown.
- [Item 75] For Fresno-Garland:
 - CO API 300 EU should be 093 instead of 593?
 - NO_y “Instrumental” should be Teledyne API T200U or 200EU?

C. Additional Items Requiring Attention

- [Item 17] Please ensure that the detailed site tables included with future plans identify monitors as “QA-Audit” if they are being used to meet QA collocation requirements.
- [Item 21] Page 40 states that, “ARB utilizes the annual network plan process to document and provide the public opportunities to comment on any proposed changes to the monitoring network.” In future plans, please also include language specifically addressing the requirement set forth in 40 CFR 58.10(c) (e.g., note that this applies to review of changes to a PM_{2.5} network, including violating PM_{2.5} monitors).
- [Item 26] Six national STN sites in CA: Fresno-Garland, Bakersfield-California Ave., Riverside-Rubidoux, Sacramento-Del Paso Manor, El Cajon-Floyd Smith, San Jose-Jackson. In future plans, please clearly define these national STN sites in your plan. (Table 20 includes others as national STN sites.)
- [Item 35] EPA notes that the March 2016 monitoring regulation updates now require PM_{2.5} flow checks to be uploaded to AQS.
- [Item 37] Table 12 lists max concentration values and sites per CBSA. Several max concentrations listed did not match what EPA found in AQS. For example, in the Bakersfield MSA, the Oildale monitor has a max concentration in 2015 of 121 µg/m³. This changes the number of required monitors for that MSA from 1-2, to 2-4. In the Riverside-San Bernardino-Ontario MSA, the Barstow monitor has a max concentration in 2015 of 145 µg/m³. This changes the number of required monitors for that MSA from 2-4 to 4-8. Values listed for most of the other MSAs also appear off, but did not change the number of required sites. Despite the different values and resulting number of required sites, all MSAs addressed in the ANP continue to have enough monitors to meet the minimum number of required PM₁₀ monitors. Please ensure the appropriate max concentration is reflected in future ANPs.
- [Item 55] As mentioned in the March 8, 2016 waiver approval letter, please note that an updated waiver request, including 2016 data, will be required for future ozone season waiver approvals after March 31, 2017. Also, the Jerseymdale site includes the word “seasonal” in the name, but the sampling season provided in the Appendix A detailed site information table covers the full year. Please fix this typo in next year’s plan.
- [Item 66] There is a typo in the Joshua Tree – Black Rock GPS coordinates. Actual latitude coordinate is 34.06957. Please update this information in next year’s plan.
- [Item 68] The Yreka second PM_{2.5} monitor (parameter code 88502) has “None” listed for parameter occurrence code. This instrument is not reporting to AQS. Please begin loading this data to AQS, and update the POC in next year’s plan.
- [Item 74] Lake County PM₁₀ monitors at Glenbrook and Lakeport are listed as reporting under parameter code 85101. These instruments are now reporting under 81102 as well as 85101, and are NAAQS comparable, as of the end of 2016. The plan thus reflects the state of the monitors in

2015. However, please note that the parameter codes for these monitors should be updated to include 81102 in next year's plan. See checklist items #70 and #72 for additional items needing attention due to this update.

- [Item 76] Please provide a specific start date for the second PM_{2.5} monitor at Yreka.
- [Item 77] Mojave site (06-029-0011) is listed as 24,000 meters from the nearest road. The table may incorrectly have mixed up the distance to roadway and traffic counts. Please correct this in next year's plan. Mojave National Preserve (06-071-1001) distance to road and traffic count are listed as "unknown." If possible, please provide an estimate for these items. See additional items regarding the distance from nearest road in checklist item #73.
- [Item 78] Mojave National Preserve distance to road and traffic count are listed as "unknown." If possible, please provide an estimate for these items. Lassen Volcanic National Park AADT was provided as "Hwy 89 terminal segment." If possible, please provide a general estimate of the AADT for this road. See additional items regarding the distance from nearest road in checklist item #73.

D. ANNUAL MONITORING NETWORK PLAN CHECKLIST

(Updated February 10, 2016)

Year: Plan dated June 2016
Agency: California Air Resources Board (ARB)

40 CFR 58.10(a)(1) requires that each Annual Network Plan (ANP) include information regarding the following types of monitors: SLAMS monitoring stations including FRM, FEM, and ARM monitors that are part of SLAMS, NCore stations, STN stations, State speciation stations, SPM stations, and/or, in serious, severe and extreme ozone nonattainment areas, and PAMS stations.

40 CFR 58.10(a)(1) further directs that, "The plan shall include a statement of purposes for each monitor and evidence that siting and operation of each monitor meets the requirements of appendices A, C, D, and E of this part, where applicable." On this basis, review of the ANPs is based on the requirements listed in 58.10 along with those in Appendices A, C, D, and E.

EPA Region 9 will not take action to approve or disapprove any item for which Part 58 grants approval authority to the Administrator rather than the Regional Administrators, but we will do a check to see if the required information is included and correct. The items requiring approval by the Administrator are: PAMS, NCore, and Speciation (STN/CSN).

Please note that this checklist summarizes many of the requirements of 40 CFR Part 58, but does not substitute for those requirements, nor do its contents provide a binding determination of compliance with those requirements. The checklist is subject to revision in the future and we welcome comments on its contents and structure.

Key:

White	meets the requirement
Yellow	requirement is not met, or information is insufficient to make a determination. Action requested in next year's plan or outside the ANP process (items listed in Enclosure A).
Green	item requires attention in order to improve next year's plan (items listed in Enclosure B).

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s. Flag if incorrect ³ ?	Does the information provided ⁴ meet the requirement? ⁵	Notes
GENERAL PLAN REQUIREMENTS					
1.	Submit plan by July 1 st	58.10 (a)(1)	Yes	Yes	Cover letter dated July 1, 2016
2.	30-day public comment / inspection period ⁶	58.10 (a)(1), 58.10 (a)(2)	Yes	Yes	Cover letter indicates no comments were received
3.	Modifications to SLAMS network – case when we are not approving system modifications	58.10 (a)(2) 58.10 (b)(5) 58.10(e) 58.14	Yes, pg 40 - 43	Insufficient information to judge in one instance	Please provide additional information to support the new PM _{2.5} SLAMS at Red Bluff-Walnut (06-103-0007), such as why a SLAMS is desired at this location, how this monitor relates to the rest of the network (including as relates to collocation), and a detailed site information table for the monitor. Please coordinate with EPA on the anticipated system modification that were still in the works when the plan was written. Note that EPA approval is needed for new FEMs that replace non-FEMs.
4.	Modifications to SLAMS network – case when we are approving system modifications per 58.14	58.10 (a)(2) 58.10 (b)(5) 58.10(e) 58.14	Yes, pg 40 - 43	Yes	With this ANP response, EPA is not approving any system modifications.
5.	Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since last ANP approval?		Yes, Appendix C	Yes	
6.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)	Yes, pg 40 - 43	Yes	

¹ Unless otherwise noted.

² Response options: NA (Not Applicable), Yes, No, Incomplete, Incorrect. The responses “Incomplete” and “Incorrect” assume that some information has been provided.

³ To the best of our knowledge.

⁴ Assuming the information is correct

⁵ Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge.

⁶ The affected state or local agency must document the process for obtaining public comment and include any comments received through the public notification process within their submitted plan.

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s. Flag if incorrect³?	Does the information provided⁴ meet the requirement?⁵	Notes
7.	A plan for establishing a near-road PM _{2.5} monitor (in CBSAs ≥ 2.5 million) by 1/1/2015 (plan was due July 1, 2014)	58.10(a)(8)(i)	NA	NA	None required for the districts/areas covered in detail by the ARB ANP.
8.	A plan for establishing a near-road PM _{2.5} monitor (in CBSAs ≥ 1 million and ≤ 2.5 million) by 1/1/2017 (plan due July 1, 2016)	58.10(a)(8)(ii)	NA	NA	None required for the districts/areas covered in detail by the ARB ANP.
9.	A plan for establishing a near-road CO monitor (in CBSAs ≥ 2.5 million) by 1/1/2015 (plan was due July 1, 2014)	58.10(a)(7) 58.13(e)(1)	NA	NA	None required for the districts/areas covered in detail by the ARB ANP.
10.	A plan for establishing a near-road CO monitor (in CBSAs ≥ 1 million and ≤ 2.5 million) by 1/1/2017 (plan due July 1, 2016)	58.10(a)(7) 58.13(e)(1)	NA	NA	None required for the districts/areas covered in detail by the ARB ANP.
11.	NO ₂ plan for establishment of 2 nd near-road monitor by 1/1/2015 (plan was due July 1, 2014)	58.10 (a)(5)(iv)	NA	NA	None required for the districts/areas covered in detail by the ARB ANP.
12.	Precision/Accuracy reports submitted to AQS	58.16(a); App A, 1.3 and 5.1.1	Yes, pg 39	Yes	States that audit results are submitted to AQS quarterly.
13.	Annual data certification submitted	58.15 App. A 1.3	Yes, pg 39	Yes	
14.	Statement that SPMs operating an FRM/FEM/ARM that meet Appendix E also meet either Appendix A or an approved alternative. Documentation for any Appendix A approved alternative should be included. ⁷	58.11 (a) (2)	Yes, pg 33	Yes	The plan states that the two PM _{2.5} FEM SPMs at Calexico Ethel did not meet Appendix E. It is not clear whether they did meet Appendix A. These monitors operated 1/1/2014 – 12/22/2015.
15.	SPMs operating FRM/FEM/ARM monitors for over 24 months are listed as comparable to the NAAQS or the agency provided documentation that requirements from Appendices A, C, or E were not met. ⁸	58.20(c)	Yes, pg 33	Yes	Page 33 of the ANP states that there were only four SPM FRM/FEM/ARMs operating during CY2015, and that the two that operated over 24 months are comparable to the NAAQS.

⁷ Alternatives to the requirements of appendix A may be approved for an SPM site as part of the approval of the annual monitoring plan, or separately.

⁸ This requirement only applies to monitors that are eligible for comparison to the NAAQS per 40 CFR §§58.11(e) and 58.30.

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s. Flag if incorrect ³ ?	Does the information provided ⁴ meet the requirement? ⁵	Notes
16.	For agencies that share monitoring responsibilities in an MSA/CSA: this agency meets full monitoring requirements or an agreement between the affected agencies and the EPA Regional Administrator is in place	App D 2(e)	Yes, but incomplete. Pg 11, 13	Insufficient information to judge	<p>ARB's PQAQO covers MSAs/CBSAs that overlap with Bay Area AQMD and South Coast AQMD. In situations where ARB relies on another agency's network to meet minimum monitoring requirements, an agreement should exist between agencies.</p> <p>ARB & BAAQMD Overlapping MSAs:</p> <ul style="list-style-type: none"> - Santa Rosa - Vallejo-Fairfield <p>ARB & SCAQMD Overlapping MSAs:</p> <ul style="list-style-type: none"> - Los Angeles-Long Beach-Anaheim - Riverside-San Bernardino-Ontario

GENERAL PARTICULATE MONITORING REQUIREMENTS (PM₁₀, PM_{2.5}, Pb-TSP, Pb-PM₁₀)

17.	Designation of a primary monitor if there is more than one monitor for a pollutant at a site.	Need to determine collocation	Yes, Appendix A	Yes	Please ensure that the detailed site tables included with future plans identify monitors as "QA-Audit" if they are being used to meet QA collocation requirements.
18.	Distance between QA collocated monitors (Note: waiver request or the date of previous waiver approval must be included if the distance deviates from requirement.)	App. A 3.2.5.6 and 3.2.6.3	Yes, Appendix A	Yes	
19.	For low volume PM instruments (flow rate < 200 liters/minute), all other PM instruments are > 1 m from the hivol. If no, list distance (meters) and instruments.	App E	Yes, pg 31 – 32	Yes	Page 32 state that all PM monitors are meeting this requirement.
20.	For high volume PM instruments (flow rate > 200 liters/minute), all other PM instruments are > 2m from the hivol. If no, list distance (meters) and instruments.	App E	Yes, pg 31 – 32	No in one instance	Page 32 states that all PM monitors are meeting this requirement except the hivol PM ₁₀ at Calxico, which was shut down in Jan 2016.

PM_{2.5} –SPECIFIC MONITORING REQUIREMENTS

21.	Document how states and local agencies provide for the review of changes to a PM _{2.5} monitoring network that impact the location of a violating PM _{2.5} monitor.	58.10 (c)	Yes, pg 40	Yes	Page 40 states that, "ARB utilizes the annual network plan process to document and provide the public opportunities to comment on any proposed changes
-----	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------	------------	-----	--------------------------------------------------------------------------------------------------------------------------------------------------------

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s. Flag if incorrect ³ ?	Does the information provided ⁴ meet the requirement? ⁵	Notes
					to the monitoring network.” In future plans, please also include language specifically addressing the requirement set forth in 40 CFR 58.10(c) (e.g., note that this applies to review of changes to a PM _{2.5} network, including violating PM _{2.5} monitors).
22.	Identification of any PM _{2.5} FEMs and/or ARMs not eligible to be compared to the NAAQS due to poor comparability to FRM(s) [Note 1: must include required data assessment.] [Note 2: Required SLAMS must monitor PM _{2.5} with <u>NAAQS-</u> comparable monitor at the required sample frequency.]	58.10 (b)(13) 58.11 (e)	NA	NA	NA
23.	Minimum # of monitoring sites for PM _{2.5} [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D, 4.7.1(a) and Table D-5	Yes, pg 25-26	Yes	EPA notes that 40 CFR 58 Appendix D, Table D-5, footnote 4, indicates that in the absence of a design value, the “< 85%” column requirements apply.
24.	Requirements for continuous PM _{2.5} monitoring (number of monitors and collocation)	App D 4.7.2	Yes, pg 27	Yes	
25.	FRM/FEM/ARM PM _{2.5} QA collocation	App A 3.2.5	Yes, pg 34	Insufficient information to judge	Table 22 on page 34 includes a footnote, that ARB is in the process of converting all 117 and 118 monitors to 143 and 145. The table shows compliance with the regulation, but it also reflects the projected conversion, not the current state of monitoring in CY2015. If the conversions are not completed by the next ANP, please include the CY2016 actual methods in addition to the intended configuration.
26.	PM _{2.5} Chemical Speciation requirements for official STN sites	App D 4.7.4	Yes, pg 31	Yes	Six national STN sites in CA: Fresno-Garland, Bakersfield-California Ave., Riverside-Rubidoux, Sacramento-Del Paso Manor, El Cajon-Floyd Smith, San Jose-Jackson (see list at https://www3.epa.gov/ttn/amtic/specgen.html). In future plans, please clearly define these national STN sites in your plan. (Table 20 includes others as national STN sites.)

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s. Flag if incorrect³?	Does the information provided⁴ meet the requirement?⁵	Notes
27.	Identification of sites suitable and sites not suitable for comparison to the annual PM _{2.5} NAAQS as described in Part 58.30	58.10 (b)(7)	Yes, pg 29; Appendix A	Incorrect in some instances	The Lakeport-Lakeport Blvd, Ukiah-Library, and Willits-Justice Center PM _{2.5} monitors appears to be incorrectly characterized as not comparable to the annual PM _{2.5} NAAQS in Appendix A.
28.	Required PM _{2.5} sites represent area-wide air quality	App D 4.7.1(b)	Yes, Appendix A	Yes	Page 25 states that only SLAMS sites representative of area-wide concentrations should be used to meet minimum monitoring requirements. In future plans, please clarify whether all those you list in your minimum monitoring requirements table therefore are area-wide.
29.	For PM _{2.5} , within each MSA, at least one site at neighborhood or larger scale in an area of expected maximum concentration	App D 4.7.1(b)(1)	Yes, pg 25-26; Appendix A	Yes	
30.	Minimum monitoring requirement for near-road PM _{2.5} monitor (in CBSA \geq 2.5 million) by 1/1/2015	58.13(f)(1) App D 4.7.1(b)(2)	NA	NA	None required for the districts/areas covered in detail by the ARB ANP.
31.	If additional SLAMS PM _{2.5} is required, there is a site in an area of poor air quality	App D 4.7.1(b)(3)			
32.	States must have at least one PM _{2.5} regional background and one PM _{2.5} regional transport site.	App D 4.7.3	Yes, pg 30	Not meeting in one instance	The ANP states that "ARB is currently evaluating the network to identify a suitable site for characterizing regional PM _{2.5} background." It does not identify one within the plan. Vallejo is listed as the Regional Transport Site.
33.	Sampling schedule for PM _{2.5} - applies to year-round and seasonal sampling schedules (note: date of waiver approval must be included if the sampling season deviates from requirement)	58.10 (b)(4) 58.12(d) App D 4.7 EPA flowchart	Yes, pg 28	Not meeting in some instances	On August 30, 2016 ARB submitted a sampling waiver request for 6 PM _{2.5} sites (Colusa (06-011-1002), Lakeport (06-033-3001), Grass Valley (06-057-0005), Roseville (06-061-0006), Redding (06-089-0004), and Woodland (06-113-1003)). EPA approves this waiver for all sites except Grass Valley. Grass Valley is required to have every day sampling. Additionally, five monitors were not meeting the required sampling frequency for all of calendar year 2016: Lancaster (06-037-9033), Victorville (06-071-0306), Ridgecrest (06-029-0015), Quincy (06-063-

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s. Flag if incorrect ³ ?	Does the information provided ⁴ meet the requirement? ⁵	Notes
					1006), and Yreka (06-093-2001). The ANP notes that Lancaster and Victorville switched to continuous methods in March/April 2016, and are therefore now meeting the sampling frequency requirement. The ANP also notes that Ridgecrest is scheduled to change to a continuous monitor, and that ARB is working on Yreka with the local district. No discussion of the Quincy monitor not meeting sampling requirements is provided within the document.
34.	Frequency of flow rate verification for manual PM _{2.5} monitors audit	App A 3.3.2	Yes, pg 39; Appendix A	Incorrect in one instance	Yreka PM _{2.5} primary monitor has a frequency of flow rate verification listed as ">= Monthly." Please clarify that the verifications are being performed at least monthly in next year's plan.
35.	Frequency of flow rate verification for automated PM _{2.5} monitors audit	App A 3.2.3	Yes, pg 39; Appendix A	Yes	EPA notes that the March 2016 monitoring regulation updates now require PM _{2.5} flow checks to be uploaded to AQS.
36.	Dates of two semi-annual flow rate audits conducted in CY2015 for PM _{2.5} monitors	App A, 3.2.4 and 3.3.3	Yes, Appendix A	Not meeting requirement in one instance	Dates for audits of PM instruments at Roseville-N Sunrise were greater than 7 months apart (2/18-9/22).

PM₁₀ -SPECIFIC MONITORING REQUIREMENTS

37.	Minimum # of monitoring sites for PM ₁₀ [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D, 4.6 (a) and Table D-4	Yes, but incorrect in some instances. Pg 22-23	Yes	Table 12 lists max concentration values and sites per CBSA. Several max concentrations listed did not match what EPA found in AQS. For example, in the Bakersfield MSA, the Oildale monitor has a max concentration in 2015 of 121 ug/m ³ . This changes the number of required monitors for that MSA from 1-2, to 2-4. In the Riverside-San Bernardino-Ontario MSA, the Barstow monitor has a max concentration in 2015 of 145 ug/m ³ . This changes the number of required monitors for that MSA from 2-4 to 4-8. Values listed for most of the other MSAs also appear off, but did not change the number of required sites. Despite the different values and resulting number of required sites, all MSAs addressed in the ANP
-----	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------	------------------------------------------------	-----	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s. Flag if incorrect ³ ?	Does the information provided ⁴ meet the requirement? ⁵	Notes
					continue to have enough monitors to meet the minimum number of required PM ₁₀ monitors. Please ensure the appropriate max concentration is reflected in future ANPs.
38.	Manual PM ₁₀ method collocation (note: continuous PM ₁₀ does not have this requirement)	App A 3.3.1	Yes, pg 35	Not meeting the requirement	ARB is evaluating locations for the last required PM ₁₀ collocated monitor.
39.	Sampling schedule for PM ₁₀	58.10 (b)(4) 58.12(e) App D 4.6	Yes, pg 24	Not meeting in some instances	For data year 2015, Calexico, El Centro, and Westmorland were not operating at the appropriate frequency (were at 1:6). The ANP indicates that at all three sites, the primary manual monitor was shut down in 2015 and a continuous monitor began operating as the primary monitor in 2016. No additional action is therefore required to meet this requirement in next year's ANP.
40.	Frequency of flow rate verification for manual PM ₁₀ monitors audit	App A 3.3.2	Yes, pg 39	Yes	Stated as being done at least once every month.
41.	Frequency of flow rate verification for automated PM ₁₀ monitors audit	App A 3.2.3	Yes, pg 39	Yes	Stated as being done at least once every month.
42.	Dates of two semi-annual flow rate audits conducted in CY2015 for PM ₁₀ monitors	App A, 3.2.4 and 3.3.3	Yes, Appendix A	Not meeting requirement in one instance	Dates for audits of PM instruments at Roseville-N Sunrise were greater than 7 months apart (2/18-9/22).
Pb –SPECIFIC MONITORING REQUIREMENTS					
43.	Minimum # of monitors for non-NCore Pb [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.5 58.13(a)	NA, pg 21	NA	None required for the districts/areas covered in detail by the ARB ANP. General requirement discussed (pg 21).
44.	Pb collocation: for non-NCore sites	App A 3.3.4.3	NA, pg 21	NA	None required for the districts/areas covered in detail by the ARB ANP. General requirement discussed (pg 21).
45.	Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator	58.10 (b)(10)	NA, pg 21	NA	None required for the districts/areas covered in detail by the ARB ANP. General requirement discussed (pg 21).

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s. Flag if incorrect³?	Does the information provided⁴ meet the requirement?⁵	Notes
46.	Any Pb monitor for which a waiver has been requested or granted by EPA Regional Administrator for use of Pb-PM ₁₀ in lieu of Pb-TSP	58.10 (b)(11)	NA, pg 21	NA	None required for the districts/areas covered in detail by the ARB ANP.
47.	Designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)	NA, pg 21	NA	None required for the districts/areas covered in detail by the ARB ANP.
48.	Sampling schedule for Pb	58.10 (b)(4) 58.12(b) App D 4.5	NA, pg 21	NA	None required for the districts/areas covered in detail by the ARB ANP.
49.	Frequency of flow rate verification for Pb monitors audit	App A 3.3.4.1	NA, pg 21	NA	None required for the districts/areas covered in detail by the ARB ANP.
50.	Dates of two semi-annual flow rate audits conducted in CY2015 for Pb monitors	App A 3.3.4.1	NA, pg 21	NA	None required for the districts/areas covered in detail by the ARB ANP.

GENERAL GASEOUS MONITORING REQUIREMENTS

51.	Frequency of one-point QC check (gaseous)	App. A 3.2.1	Yes, pg 38; Appendix A	Not meeting requirement in one instance; insufficient information to judge	<p>The requirement is for one-point QC checks to be performed at least once every two weeks. The following sites are not meeting this requirement or provided insufficient information to judge whether they met this requirement or not:</p> <ul style="list-style-type: none"> • Sonora-Barretta Street (monthly) • Lancaster (2 per month) • Barstow (2 per month) • Hesperia-Olive Street (2 per month) • Phelan (2 per month) • Trona (2 per month) • Victorville (2 per month) <p>Additionally, information was provided as “unknown” for Joshua Tree NP-Pinto Wells and Mojave National Preserve. Please include this information in future plans if available.</p>
52.	Date of Annual Performance Evaluation (gaseous) conducted in CY2015	App. A 3.2.2	Yes, Appendix A	Yes	

O₃ –SPECIFIC MONITORING REQUIREMENTS

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s. Flag if incorrect ³ ?	Does the information provided ⁴ meet the requirement? ⁵	Notes
53.	Minimum # of monitoring sites for O ₃ [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.] [Note 3: monitors that do not meet traffic count/distance requirements to be neighborhood or urban scale (40 CFR Appendix E, Table E-1) cannot be counted towards meeting minimum monitoring requirements]	App D, 4.1(a) and Table D-2	Yes, pg 14-16	Yes	Table 6 presents this information in a comprehensive, easy to understand format.
54.	Identification of maximum concentration O ₃ site(s)	App D 4.1 (b)	Yes, pg 14-16	Yes	
55.	Sampling season for O ₃ (Note: Waivers must be renewed annually. EPA expects agencies to submit re-evaluations of the relevant data each year with the ANP. EPA will then respond as part of the ANP response.)	58.10 (b)(4) App D, 4.1(i)	Yes, pg 16; Appendix A; Appendix B	Yes	As mentioned in the March 8, 2016 waiver approval letter, please note that an updated waiver request, including 2016 data, will be required for future ozone season waiver approvals after March 31, 2017. Jerseydale site includes the word “seasonal” in the name, but the sampling season provided in the Appendix A detailed site information table covers the full year. Please fix this typo in next year’s plan.
NO₂ –SPECIFIC MONITORING REQUIREMENTS					
56.	Minimum monitoring requirement for single near-road NO ₂ monitor (in CBSA ≥ 1 million) by 1/1/2014 [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	58.13(c)(3) App D 4.3.2	NA, pg 17-18	NA	None required for the districts/areas covered in detail by the ARB ANP. General requirements discussed (pg 17-18).
57.	Minimum monitoring requirement for second near-road NO ₂ monitor (in CBSA ≥ 2.5 million) by 1/1/2015 ⁹ [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	58.13(c)(4) App D 4.3.2	NA, pg 17-18	NA	None required for the districts/areas covered in detail by the ARB ANP. General requirements discussed (pg 17-18).
58.	Minimum monitoring requirements for area-wide NO ₂ monitor in location of expected highest NO ₂ concentrations representing neighborhood or larger scale (operation required by January 1, 2013) ⁹	App D 4.3.3	NA, pg 17	NA	None required for the districts/areas covered in detail by the ARB ANP. General requirements discussed (pg 17).

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s. Flag if incorrect³?	Does the information provided⁴ meet the requirement?⁵	Notes
59.	Minimum monitoring requirements for susceptible and vulnerable populations monitoring (aka RA40) NO ₂ (operation required by January 1, 2013) ⁹	App D 4.3.4	NA, pg 18	NA	None required for the districts/areas covered in detail by the ARB ANP. General requirements discussed (pg 18).
60.	Identification of required NO ₂ monitors as either near-road, area-wide, or vulnerable and susceptible population (aka RA40)	58.10 (b)(12)	NA, pg 17-18	NA	None required for the districts/areas covered in detail by the ARB ANP. General requirements discussed (pg 17-18).
CO –SPECIFIC MONITORING REQUIREMENTS					
61.	Minimum monitoring requirement for near-road CO monitor (in CBSA ≥ 2.5 million) by 1/1/2015 ⁹	58.13(e)(1) App D 4.2.1	NA, pg 19	NA	None required for the districts/areas covered in detail by the ARB ANP. General requirements discussed (pg 19).
SO₂ –SPECIFIC MONITORING REQUIREMENTS					
62.	Minimum monitoring requirements for SO ₂ based on PWEI and/or RA required monitors under Appendix D 4.4.3 [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.4	NA	NA	None required for the districts/areas covered in detail by the ARB ANP. General requirements discussed (pg 20).
63.	Monitors used to meet Data Requirements Rule included in July 1, 2016 ANP (to be installed no later than January 1, 2017).	40 CFR 51.1203(c)	NA	NA	None required for the districts/areas covered in detail by the ARB ANP.
NCORE –SPECIFIC MONITORING REQUIREMENTS					
64.	NCore site and all required parameters operational: year-round O ₃ , trace SO ₂ , trace CO, NO _y , NO, PM _{2.5} mass, PM _{2.5} continuous, PM _{2.5} speciation, PM _{10-2.5} mass, resultant wind speed at 10m, resultant wind direction at 10m, ambient temperature, relative humidity, and Pb at CBSAs ≥ 500,000.	58.10 (a)(3); Pb collocation App. A 3.3.4.3; PM _{10-2.5} minimum monitoring App. D 4.8; PM _{10-2.5} sampling schedule 58.10 (b)(4) 58.12(f)	NA	NA	None required for the districts/areas covered in detail by the ARB ANP.

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s. Flag if incorrect ³ ?	Does the information provided ⁴ meet the requirement? ⁵	Notes
		App D 4.8; PM _{10-2.5} collocation App. A 3.3.6			
SITE OR MONITOR - SPECIFIC REQUIREMENTS (OFTEN INCLUDED IN DETAILED SITE INFORMATION TABLES)					
65.	AQS site identification number for each site	58.10 (b)(1)	Yes, Appendix A	Yes	
66.	Location of each site: street address and geographic coordinates	58.10 (b)(2)	Yes, Appendix A	Yes	There is a typo in the Joshua Tree – Black Rock GPS coordinates. Actual latitude coordinate is 34.06957. Please update this information in next year's plan.
67.	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)	Yes, Appendix A	Yes	
68.	Parameter occurrence code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, Appendix A	Yes	The Yreka second PM _{2.5} monitor (parameter code 88502) has "None" listed for parameter occurrence code. This instrument is not reporting to AQS. Please begin loading this data to AQS, and update the POC in next year's plan.
69.	Statement of purpose for each monitor	58.10 (a)(1)	Yes	Yes	The monitoring objective speaks to the statement of purpose.
70.	Basic monitoring objective for each monitor	App D 1.1 58.10 (b)(6)	Yes, Appendix A	Incorrect in some instances	PM _{2.5} monitors reporting under parameter codes 88501 and 88502 are not eligible for comparison to the NAAQS. "NAAQS" should be removed as a monitor objective for these monitors at the following sites: Colusa-Sunrise Blvd (POC 3), Grass Valley-Litton Building (POC 3), Red Bluff-Walnut Street (POC 1). Lassen Volcanic National Park O ₃ monitor is comparable to the NAAQS. "NAAQS" should be added to the monitoring objectives for this monitor.

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s. Flag if incorrect ³ ?	Does the information provided ⁴ meet the requirement? ⁵	Notes
					See note on checklist item #74 regarding Lake County PM ₁₀ monitors. Please update the monitoring objective for these monitors to include NAAQS in next year's plan.
71.	Site type for each monitor	App D 1.1.1	Yes, Appendix A	Yes	
72.	Monitor type for each monitor, and Network Affiliation(s) as appropriate	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, Appendix A	Incomplete in two instances	<p>Please add a monitor type of "SLAMS" to NO₂ monitors at Simi Valley and El Rio PAMS sites.</p> <p>See note on checklist item #74 regarding Lake County PM₁₀ monitors. Please update the monitoring type for these monitors in next year's plan as appropriate.</p>
73.	Scale of representativeness for each monitor as defined in Appendix D	58.10(b)(6); App D	Yes, Appendix A	Incorrect/insufficient to judge in some instances	<p>In general, for each site, ARB should review of whether the information about distance to roadway and traffic counts provided are appropriate for the respective monitors. Some of the distances provided are hundreds or even thousands of meters from the monitors, and may not be relevant for determining the scale of representativeness or whether siting criteria are met. At the same time, information about nearby roads may not be included even though they may impact scale and siting requirements. Please also clarify the road for which the information is being provided. If multiple roads are relevant for determining the scale of representativeness, please provide information for all relevant roads.</p> <p>Some additional specific issues:</p> <p>Canebrake PM is listed as Regional, but should be Urban scale according to the information provided.</p> <p>Lakeport PM_{2.5} is listed as Urban, but should be Neighborhood scale according to the information provided.</p>

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s. Flag if incorrect ³ ?	Does the information provided ⁴ meet the requirement? ⁵	Notes
					<p>Barstow CO, O₃, and NO₂ are listed as Neighborhood scale, but should be Middle scale according to the information provided. Barstow PM₁₀ is listed as Urban scale, but should be Neighborhood scale or smaller.</p> <p>Shasta Lake – La Mesa PM₁₀ is listed as Regional scale, but should be Neighborhood scale according to the information provided.</p>
74.	Parameter code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, Appendix A	Yes	Lake County PM ₁₀ monitors at Glenbrook and Lakeport are listed as reporting under parameter code 85101. These instruments are now reporting under 81102 as well as 85101, and are NAAQS comparable, as of the end of 2016. The plan thus reflects the state of the monitors in 2015. However, please note that the parameter codes for these monitors should be updated to include 81102 in next year's plan. See checklist items #70 and #72 for additional items needing attention due to this update.
75.	Method code and description (e.g., manufacturer & model) for each monitor	58.10 (b)(3); App C 2.4.1.2	Yes, Appendix A	Yes	
76.	Sampling start date for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, Appendix A	Yes	Please provide a specific start date for the second PM _{2.5} monitor at Yreka.
77.	Distance of monitor from nearest road	App E 6	Yes, Appendix A	Yes	<p>Mojave site (06-029-0011) is listed as 24,000 meters from the nearest road. The table may incorrectly have mixed up the distance to roadway and traffic counts. Please correct this in next year's plan.</p> <p>Mojave National Preserve (06-071-1001) distance to road and traffic count are listed as "unknown." If possible, please provide an estimate for these items.</p>

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s. Flag if incorrect ³ ?	Does the information provided ⁴ meet the requirement? ⁵	Notes
					See additional items regarding the distance from nearest road in checklist item #73 above.
78.	Traffic count of nearest road	App E	Yes, Appendix A	Yes	<p>Mojave National Preserve distance to road and traffic count are listed as “unknown.” If possible, please provide an estimate for these items.</p> <p>Lassen Volcanic National Park AADT was provided as “Hwy 89 terminal segment.” If possible, please provide a general estimate of the AADT for this road.</p> <p>See additional items regarding the distance from nearest road in checklist item #73 above.</p>
79.	Groundcover	App E 3(a)	Yes, Appendix A	Yes	
80.	Probe height	App E 2	Yes, Appendix A	Yes	
81.	Distance from supporting structure	App E 2	Yes, Appendix A	Not meeting requirement in several instances	<p>Distance from supporting structure should be >2m for all PM instruments.</p> <p>The following PM_{2.5} instruments do not meet this requirement:</p> <ul style="list-style-type: none"> • Ridgecrest • (note: Chester 88501 also not meeting) <p>The following PM₁₀ instruments do not meet this requirement:</p> <ul style="list-style-type: none"> • Canebrake • Ridgecrest • Brawley-Main Street #2 (POC 1 primary) • Calexico-Ethel St (POC 3 primary) • Niland-English Road (POC 1 primary) • Hesperia-Olive Street • Colfax-City Hall • Anderson-North Street • Redding-Health Department • Shasta Lake-La Mesa • West Sacramento-15th Street

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s. Flag if incorrect ³ ?	Does the information provided ⁴ meet the requirement? ⁵	Notes
					<ul style="list-style-type: none"> Woodland-Gibson Road
82.	Distance from obstructions on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(b)	Yes, Appendix A	Not meeting requirement in one instance	<p>40 CFR 58 Appendix E indicates that the distance to any obstruction must be at least twice the height of the obstruction above the probe.</p> <p>Shasta Lake-Lake Blvd O₃ monitor does not meet this requirement for obstructions on the roof.</p>
83.	Distance from obstructions not on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(a)	Yes, Appendix A	Not meeting requirement in some instances	<p>40 CFR 58 Appendix E indicates that the distance to any obstruction must be at least twice the height of the obstruction above the probe.</p> <p>The following monitors do not meet this requirement for obstructions not on the roof:</p> <ul style="list-style-type: none"> Calexico-Ethel Street – all PM monitors except PM_{2.5} POC 4 Lassen Volcanic NP O₃ monitor Shasta Lake-Lake Blvd O₃ monitor
84.	Distance from the drip line of closest tree(s)	App E 5	Yes, Appendix A	Not meeting requirement in some instances	<p>40 CFR 58 Appendix E states that the probe, inlet, or at least 90 percent of the monitoring path must be at least 10 meters or further from the drip line of trees.</p> <p>The following monitors do not meet this requirement:</p> <ul style="list-style-type: none"> Ridgecrest PM₁₀ and PM_{2.5} Calexico Ethel Street – all monitors Glenbrook PM₁₀ Yosemite Village-Visitor Center PM₁₀ and PM_{2.5} Lassen Volcanic NP O₃
85.	Distance to furnace or incinerator flue	App E 3(b)	Yes, Appendix A	Yes	
86.	Unrestricted airflow (expressed as degrees around probe/inlet or percentage of monitoring path)	App E, 4(a) and 4(b)	Yes, Appendix A	Yes	
87.	Probe material (NO/NO ₂ /NO _y , SO ₂ , O ₃ ; For PAMS: VOCs, Carbonyls)	App E 9	Yes, Appendix A	Insufficient to judge in one instance	Mojave National Preserve O ₃ incorrectly says “NA” for probe material.

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s. Flag if incorrect ³ ?	Does the information provided ⁴ meet the requirement? ⁵	Notes
					Also, please verify whether the “glass” listed for Healdsburg-Municipal Airport and Redding-Health Department is Pyrex/borosilicate glass.
88.	Residence time (NO/NO ₂ /NO _y , SO ₂ , O ₃ ; For PAMS: VOCs, Carbonyls)	App E 9	Yes, Appendix A	Insufficient to judge in one instance	Mojave National Preserve O ₃ incorrectly says “NA” for residence time. Note that Willows-Colusa has a residence time of 19.9 seconds.

Public Comments on Annual Network Plan

Were comments submitted to the S/L/T agency during the public comment period?

No.

If no, skip the remaining questions.

If yes:

- Were any of the comments substantive?
 - If yes, which ones?
 - Explain basis for determination if any comments were considered not substantive:
- Did the agency respond to the substantive comments?
 - If yes, was the response adequate?
- Do the substantive comments require separate EPA response (i.e., agency response wasn’t adequate)?
- Are the sections of the annual network plan that received substantive comments approvable after consideration of comments?
 - If yes, provide rationale:

